

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Southern District of New York
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June 7, 2023


Via ECF

The Honorable Ronnie Abrams
Southern District of New York
40 Foley Square
New York, NY 10007

Application granted in part and denied in part.
Mr. Rosario's electronic monitoring shall remain
in effect, but his curfew is extended to 10 p.m.

Re: United States v. Pedro Rosario
21 Cr 484 (RA)

SO ORDERED.



Ronnie Abrams, U.S.D.J.
June 7, 2023

Dear Judge Abrams:

I write to request the Court amend Mr. Rosario's conditions of release to remove the condition of electronic monitoring and a curfew. In the alternative, the defense respectfully requests the Court extend Mr. Rosario's curfew to 10 PM. Probation opposes this request; the Government has not provided the defense with a position.

Mr. Rosario currently checks in once a week with his probation officer in Pennsylvania, twice a week with the bail bondman's who paid his Pennsylvania bail, and he is in regular communication with his SDNY probation officer. After his arrest in Pennsylvania, Mr. Rosario let Probation know immediately about his arrest and he voluntarily surrendered on the violation of supervised release. His location has now been monitored for two months, without incident. Given his compliance and strict supervision from various entities, the location monitoring is no longer necessary, and the defense respectfully requests its removal.

In the alternative, the defense requests the Court extend Mr. Rosario's curfew from 6 P.M. to 10 P.M. There is no legitimate reason to ask Mr. Rosario to be home by 6, and it is severely, and negatively, impacting his life. As part of his release, he agreed to move in with his mother and out of his girlfriend's apartment. His girlfriend, who works at a dentist's office, is usually not home until 6 P.M. This extension will allow him to spend time with his girlfriend after she finishes work.

Mr. Rosario has appeared in Pennsylvania Court as required for his State case and is compliant with the terms of his release on the violation of supervision.

PEDRO ROSARIO (6.7.23)

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Thank you for the Court's consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'IAN', is written over a horizontal line.

Ian Marcus Amelkin, Esq.
(212) 417-8733

cc: AUSA Jerry Fang, Esq.